

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

FILED BY U.S. D.C.

05 JUL 27 AM 10: 25

UNITED STATES OF AMERICA,)
vs.) Plaintiff,
TRINA THOMAS,) Defendant.

) Cr. No. 04-20506-MJ

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF THE MEMPHIS

MOTION GRANTED
Matter is RESET
for Report on August
26, 2005 at 9:00 AM.
Time is EXCLUDED.

JON PHIPPS McCALLA
U.S. DISTRICT JUDGE

JUL 26, 2005

DATE

MOTION TO CONTINUE TRIAL

Comes now the United States by and through its counsel, Terrell L. Harris, United States Attorney for the Western District of Tennessee and moves the Court to continue the trial of Trina Thomas currently scheduled for August 8, 2005.

In support of said motion, the United States submits that the government's cooperating witness is in Federal Custody. The United States Marshals have informed government counsel that this witness is being housed out of state and is deemed to be experiencing a high risk pregnancy. It has been further represented that Bureau of Prisons' medical staff will not clear her for travel to the Western District of Tennessee. The government will not be requesting a long continuance as it has been represented by the United States Marshals that this individual's due date is in September. Pursuant to local rules, counsel for the defendant has been contacted and indicates he will oppose the motion.

Respectfully submitted,

TERRELL L. HARRIS
United States Attorney

By:

V. Rae Oliver
V. RAE OLIVER
Assistant United States Attorney
167 N. Main, Room 800
Memphis, TN 38103
(#18831 Tennessee)

CERTIFICATE OF SERVICE

I, V. Rae Oliver, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing Motion to Continue Trial has been mailed, first class postage pre-paid, to K. Jayaraman, 147 Jefferson Avenue, Memphis, Tennessee 38103, Facsimile (901) 522-8243.

This 26 day of July, 2005.

V. Rae Oliver
V. RAE OLIVER
Assistant United States Attorney
167 N. Main, Room 800
Memphis, TN 38103



Notice of Distribution

This notice confirms a copy of the document docketed as number 29 in case 2:04-CR-20506 was distributed by fax, mail, or direct printing on July 29, 2005 to the parties listed.

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Honorable Jon McCalla
US DISTRICT COURT